APPENDIX H

COMMENTS ON THE DRAFT EA AND RESPONSES TO COMMENTS

Comments were accepted on the *Desatoya Mountains Habitat Resiliency, Health, and Restoration* project Environmental Assessment, DOI-BLM-NV-C010-2011-0513-EA, for a 30 day period from March 5, 2012 through April 4, 2012; although comments received in a timely manner after this date were also considered.

Letters to 41 individuals, organizations and agencies (including two Tribes) were mailed on March 5, 2012. Notification of the availability of the EA to 33 other State and federal offices was made through the Nevada State Clearinghouse on March 5, 2012. The CCD published a news release on March 5, 2012 that was sent to media outlets listed on the Nevada BLM State Office media list.

Although not required for an EA by regulation, an agency may respond to substantive and timely comments. Substantive comments: 1) question, with reasonable basis, the accuracy of information in the EIS or EA; 2) question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis; 3) present new information relevant to the analysis; 4) present reasonable alternatives other that those analyzed in the EIS or EA; and/or 4) cause changes or revisions in one or more of the alternatives. No response is necessary for non-substantive comments (BLM, 2008). Some commenters requested personal responses to their comments but due to the volume of comments this was not possible. All comments were reviewed, considered, and then categorized into topics when feasible. Distinct topics and comments are summarized in Table 1.

Individual Letters

Comment letters were received from 159 individuals and non-governmental organizations by email, fax or mail. Organizations included Toiyabe Chapter of the Sierra Club, Animal Welfare Institute (AWI), American Horse Defense Fund, the Cloud Foundation, Western Watersheds, and the American Wild Horse Preservation Campaign (AWHPC). Minor non-substantive changes were made to the EA as a result of the individual letters (noted in the response tables).

Form Letters

There were 3,792 form letters received via email. While there were minor variations, the content in all the form letters was essentially the same. All individuals who submitted form letters were opposed to the gather as well as all other aspects of the project. Minor non-substantive changes were made to the EA as a result of the form letters (noted in the response).

Agency Comments

Comment letters were received from the Nevada State Land Use Planning Agency, the Nevada Department of Wildlife (NDOW), the U.S. Fish and Wildlife Service (Nevada Office Pacific Southwest Region), Nevada State Historic Preservation Office, Nevada Department of Transportation. All agencies expressed support for all aspects of the project with the exception of removing decadent sagebrush.

Table 1. Categorized comments that were received by email, fax, and letter, and BLM's responses.

Number	Comment	Response
1	Supported all aspects of the proposed action including returning wild horse numbers to established AML, working cooperatively with Smith Creek Ranch, as well as other partners, and herbicide treatments of rabbitbrush and 563 acres of cheatgrass.	Comment noted.
2	Supportive of all aspects of the project with the exception of treating decadent sagebrush.	Treating decadent sagebrush has been removed from the proposed action.
3	The Nevada State Historic Preservation Office supports the project as written.	Comment noted.
4	Support reducing wild horse numbers to AML but concerned it may be counterproductive because livestock numbers are not being reduced.	See comment 7.
5	Supports much of proposed action but concerned that restoration objectives are not clear and no firm commitment to effectiveness monitoring because of funding limitations. Also concerned PJ thinning will harm some woodland bird species.	Section 2.1 subheading Monitoring/Adaptive Management provides this discussion and states that the scope of monitoring is dependent on funding. Bird point counts will be conducted in 2012 and 46 vegetation transects have been established by project partners. Ground water monitoring wells have been installed in Dalton Canyon. Yearly smaller treatment designs will be developed based on these data as well as project partner expertise, which includes future data from UNR's experimental watershed and subsequent analysis in Porter Canyon.
6	Against removing decadent sagebrush.	See comment #3.
7	Allocate more forage to Wild Horses and increase the wild horse AML (Appropriate Management Level) and reduce the number of cattle grazing in this Wild Horse Herd Area per CFR 4710.5 & .6.	Section 2.4 addressed an alternative considered that would have reduced livestock grazing and an alternative that would have increased the AML for wild horses. For the reasons discussed in the analysis, these alternatives were considered but eliminated from more detailed analysis.
8	Wild horses do no more damage than cattle to public lands. In 1990 the Government Accountability Office Report underscored that wild horse removals did not significantly improve range conditions. The report pointed to cattle as the culprit as they vastly outnumber horses on BLM---managed public lands.	We could not find this statement in the October 2008 GAO report, the most recent report dealing with wild horses. In contrast the GAO found: "The overpopulation of wild horses and burros on the range may negatively impact herd health, rangeland health, and livestock and wildlife that depend on the range. An over-obligation of the vegetative resources can result in declines in the healthy vegetative condition that may take years to recover. See figure 6 for

		our survey results on the possible negative impacts of populations that exceed the upper limits of AML."
9	Consider the use of the one-year reversible, non-hormonal, field-dartable version of PZP combined with water/bait-trapping in lieu of helicopter.	As stated in Section 2.1 Excess Wild Horse Removal, "All wild horse mares released back into the HMA would be treated with fertility control vaccine (PZP-22 or the most current formulation) to maintain AML, extend the time before another gather is required, and reduce the number of excess wild horses that would need to be removed in the future." While this method is currently approved for use, it would not work for this proposed action because: (1) the use of one-year PZP would not achieve the Proposed Action of achieving AML within the HMAs, without removing excess animals within and outside HMA boundaries; (2) the number of wild horses in the Desatoya HMA makes it unrealistic to be able to clearly identify all mares targeted for treatment; and (3) limited approachability to the target wild horses. The logistics of implementing this method in tandem with bait and/or water trapping is also impractical for the reasons listed above.
10	Conduct an accurate, current census using the most up-to-date technology prior to any removal of wild horses. The EA is based on aerial survey flights made in July 2011.	The aerial survey flight made on July 5, 2011 estimated a total of 543 wild horses. This inventory is considered current and based upon the best available data.
11	Do not count wild horse foals in calculating the AML per your own BLM Handbook.	Per the BLM Wild Horses and Burros management Handbook 4700-1, AML applies to the number of adult wild horses or burros to be managed within the population and does not include current year's foals. All WH&Bs one year of age and older are considered adults (a foal is considered one year of age on January 1 of the year following its birth). The EA does not imply that foals are included within the AML. The number of foals observed during inventory flights is recorded to determine the percent foals represented in the population over time.
12	Standard Operating Procedures should include: 1. Temperature & distance parameters if helicopter gathers are conducted 2. No removal of older animals	Standard Operating Procedures are outlined in Appendix D. BLM staff is on site at the gather continuously, monitoring weather conditions and health and well-being of wild horses. Adjustments to gather operations are made as necessary to ensure animal health and safety. At this time, specific temperature and distance parameters have not been included in the gather contract, but left to the discretion of the BLM COR to adapt gather operations to site specific conditions and animal needs. Following the annual helicopter hearings, the BLM reviews SOPs for adequacy. Nothing was

		proposed during the 2011 hearing that would warrant change. Over the past year, various professionals of the veterinary and equine community have observed gathers and holding facilities, and followed up with reports of their findings and recommendations to BLM. For the most part, the team members found that wild horse and burro gathers are necessary, and conducted humanely. Many of the recommendations have already been implemented by BLM and the gather contractors. These reports can be viewed at these locations: Office of Inspector General (OIG)report on the WHB program: http://www.doioig.gov/images/stories/reports/pdf/BLM%20Wild%20Horse%20and%20Burro%20Program%20Public.pdf
13	Commenter is requesting that the Stillwater Field Manager submit a request to Bob Abbey that the Desatoya HMA be designated as a Wild Horse and Burro Range as per 43 CFR 4710.3-2 and BLM Manual 1203: Delegation of Authority.	The Desatoya HMA has not been designated as a WH&B Range under 43 CFR 4710.3-2." "Only the BLM Director or Assistant Director (per BLM Manual 1203: Delegation of Authority), may establish a Wild Horse and Burro Range after a full assessment of the impact on other resources through the land-use planning process. An HMA may be considered for designation as a WH&B Range to be managed principally, but not necessarily exclusively for WH&B. The designation of a WH&B Range for the Desatoya HMA is outside the scope of this EA.
14	Will the BLM be doing an EA for each planned gather?	No. Gather activities described in Sections 2.1 & 3.8 would be covered under this EA over the ten year life of the project. Language in the final EA was changed in Section 2.1 and 3.8 to provide more clarity and consistency in this regard. They both state that; "If the proposed bait/water trapping and fertility control treatments prove to be unsuccessful in maintaining population objectives, then it is anticipated that a follow up helicopter-driven gather would be implemented in the Desatoya HMA every two to three years over the next 10 years to re-vaccinate the mares and remove excess animals. All future gather activities would be conducted in a manner consistent with those described for the late summer/early fall 2012 gather."
15	"Guzzlers," should be utilized in the HMA to protect riparian areas instead of fences.	In this project area, the riparian areas proposed for fencing are degraded due to the combination of pinyon-juniper encroachment/increased density and overutilization of vegetation during the growing season that does not allow recovery. This has led to hydrological changes such as lowering of the water table, down cutting, and

		nick points, which are essentially draining the wet meadow systems. Guzzlers would not prevent overutilization of wet meadow grasses.
16	What is the nature of the contract with Smith Creek Ranch, how was it procured, and why was it agreed to before the EA was issued or the Decision Record signed.	There is no contract that has been procured at this time. As stated in EA section 1.1 Introduction, the BLM is ***proposing*** to enter into a cooperative agreement with Smith Creek Ranch LLC in which permanent or semi-permanent corrals would be constructed around one or more water sources (public or private land) to enable bait/water trapping of wild horses for the purpose of maintaining the population within the AML range, and as stated on Page 21 of the EA, Standard Operating Procedures described in the National Wild Horse and Burro Gather Contract in Appendix D will be followed by Smith Creek Ranch.
17	Impact of Proposed Action on Genetic Diversity of Desatoya HMA Population Not Adequately Analyzed.	A genetic analysis report was completed on May 5, 2004 by E. Gus Cothran. His recommendations state, "No action is needed at this time. The AML for the herd is high enough that future loss of variation should be at acceptable levels for many generations. As stated in Section 2.1, hair samples could be collected for another analysis but may not be deemed necessary.
18	A complete economic analysis is lacking in the EA.	The Wild Free Roaming Horses and Burros Act (WFRHBA) does not authorize a cost-based decision-making process if excess horses are present. ―*Proper range management dictates removal of horses before the herd size causes damage to the range land.*‖ (118 IBLA 75).
19	The EA must include a detailed breakdown of range data, including data distinguishing wild horse from livestock impacts.	The BLM is not required to separate impacts of wild horses from those of livestock in order to determine and remove excess wild horses from the range. The EA does state in Section 1.6 Conformance With Rangeland Health Standards and Guidelines By Livestock Grazing Allotment that: "Maintaining wild horse populations within AML sustains a healthy horse population, ensures a thriving natural ecological balance, and prevents degradation of rangeland conditions by deterring negative impacts to rangeland resources that can result from wild horse over population. This has been demonstrated by evaluation of key areas and ecological sites under rangeland health assessment protocols. Damage results from over utilization of resources when populations exceed the carrying capacity of the rangeland. Riparian and upland objectives are not being met due to Pinion/Juniper (PJ) encroachment coupled with overpopulation of wild horses that have degraded wet meadows and sagebrush plant communities. Excess wild horses have

		damaged spring developments such as corrals, troughs, spring boxes and spring sources (personal communications from NDOW and Smith Creek Ranch)." Although no data exists to assess the degree of impacts of wild horses versus livestock, spring development damage is a major contributing factor to the reduction of the available water supply. Maintaining wild horse numbers within the AML would reduce the occurrence of damage to springs and spring developments enhancing the availability of water for wildlife, livestock, wild horses, and riparian vegetation.
20	Impacts of sex ratio skewing proposal not evaluated.	Normal sex ratios experienced through independent research and gathers conducted by the BLM over the past 35 years show that sex ratios in normal populations can vary from 40:60 favoring mares to 60:40 favoring studs. Population control methods including the adjustment of sex ratios to favor stallions would be expected to have relatively minor impacts to overall population dynamics. Impacts of additional stallions in the population could include: decreased band size, increased competition for mares, and increased size and number of bachelor bands. These effects would be slight, as the proposed sex ratio is not an extreme departure from normal sex ratio ranges. Additionally, with more stallions involved in breeding it should result in increased genetic exchange and improvement of genetic health within the herd. Modification of sex ratios for a post-gather population favoring stallions could also reduce growth rates and subsequent population size, as a smaller proportion of the population would consist of mares that are capable of giving birth to foals. As a result, gather frequency could be reduced as well as the numbers of horses gathered and removed in future gathers.
21	The WFRHBA state that the preservation of wild horses must take precedence over access by livestock on public lands.	The WFRHBA does not make this statement. Information about the Congress' intent is found in the Senate Conference Report (92-242) which accompanies the 1971 WFRHBA (Senate Bill 1116): **"*The principal goal of this legislation is to provide for the protection of the animals from man and not the single use management of areas for the benefit of wild free-roaming horses and burros*** [emphasis added]. *It is the intent of the committee that the wild free-roaming horses and burros be specifically incorporated as a component of the multiple-use plans governing the use of the public lands.*‖
22	EA lacks scientific data and justification for removal of "excess" horses.	See Response number 19 above. EA section 3.3 states: "When wild horse AML is exceeded

		and maintained over time, overutilization of vegetation and water sources by wild horses occurs, decreasing plant diversity and in turn changing habitat structure (Beever and Brussard 2000). This is currently occurring in parts of the project area. Beever at al. 2008 conducted a study of vegetation response to removal of horses in 1997 and 1998 (part of the study was in the Clan Alpine HMA, which is close to the Desatoya HMA). The paper concluded that horse removed sites exhibited 1.1-1.9 times greater shrub cover, 1.2-1.5 times greater total plant cover, 2-12 species greater plant species richness, and 1.9-2.9 times greater cover and 1.1-2.4 times greater frequency of native grasses than in horse occupied sites". Section 3.7 states: The upper limit of the AML range is the maximum number of wild horse that can be maintained within an HMA to achieve a thriving natural ecological balance and not adversely impact the plant community in combination with other multiple uses such as wildlife and livestock grazing. Section 3.8 states: "Heavy use is occurring on key forage grass species. Substantial areas of the HMA supply very little forage grasses or are too steep to be grazed, however, approximately 88,657 acres (≈ 54% of HMA) are accessible to wild horses and for the most part cattle. In the 2010 grazing year heavy use was documented for these areas. Additionally, Section 1.3 provides justification and the EA states in Section 1.2, "The AMLs were established through Final Multiple Use Decisions following completion of an in-depth analysis of habitat suitability, resource monitoring and population inventory data, and public input into the decision-making process. The upper limit of the AML range is the maximum number of wild horses that can be maintained within a HMA while maintaining a thriving natural ecological balance and multiple use relationship on the public lands. Establishing the AMLs within a population range allows for the periodic removal of excess animals (to the low end) and subsequent population growth (to the high end) between removals. The established AML for the Desatoya HMA is 127-180 individuals but the current population estimate is 543 individuals (3 times the high AML level). It is projected that 651 horses including the 2012 foal crop would be in the population at the time of implementation of the proposed management action." Section 3.8 further states: During the population inventory flight, the valley bottoms and the area around

		meadows near Haypress were being heavily used by wild horses. Heavy use is occurring on key forage grass species. Substantial areas of the HMA supply very little forage grasses or are too steep to be grazed. The 2010 grazing year documented heavy use for these areas. The forage grasses cannot sustain this level of use.
23	EA fails to adequately assess impacts of proposed action on wild horses, including spontaneous abortions and short-term holding on individuals, and fails to evaluate procedures for minimizing stress and injury to horses during roundup.	The Environmental Consequences Section 3.8 describes the potential impacts of the Proposed Action in detail. Appendix C & D also details Standard Operating Procedures developed over the past 35 years to ensure the well-being of wild horses during gathers and maintain human safety.
24	Impacts of mass removals on population growth within the HMA are not analyzed.	The BLM is removing horses to AML range to establish TNEB. Past gathers have not impacted growth rates. Table 2 in the EA displays past gather history and subsequent population increases.
25	EA fails to analyze role of predators In achieving TNEB and populations of hunted wildlife species are not analyzed.	Predator control programs are managed by the USDA Wildlife Services, not the BLM. Additionally, wildlife is administered by the Nevada Department of Wildlife. The BLM has absolutely no control over wildlife population control, issuance of hunting tags or protection plans. The alternative of using natural controls to achieve a desirable AML has not been shown to be feasible in the past. Wild horse and burro population in the Desatoya HMA is not substantially regulated by predators, as evidenced by the 20% annual increase in wild horse populations.
26	EA fails to delineate water allocations in the HMA and impacts on horses.	Allocations of water are outside the scope of this analysis. The State water engineer controls all water allocation in Nevada. The BLM does not hold any water rights in the HMA. According to the State of Nevada Division of Water Resources water rights database, Smith Creek Ranch holds water rights to 49 water sources.
27	PEA Fails to Consider Improving Public Observation	Appendix D subheading I. outlines public involvement in relation to the gather. Due to the inherent need for very low human interaction and presence at the bait trapping location, public visitation will not be allowed.
28	The Proposed Action does not adhere to the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA) Section §1333 (a) which states, "All management activities shall be at the minimal feasible level…"	The full context of 43 CFR 4710.4 states that, "management shall be at the minimum level necessary to attain the objectives identified in the approved land use plan and herd management area plans." Conducting the horse gathers at this time is consistent with this regulation.

29	Recreational users of these public lands, specifically those who enjoy wild horse photography and viewing, will be negatively impacted by the Proposed Action.	There will still be wild horses on the range for viewing and photography.
30	Why doesn't BLM discuss the positive impacts of wild horses such as boosting local economies through eco-tourism?	No information had been provided to the BLM that wild horse sightseeing contributes significantly to the local economy nor have specific ecotourism proposals been brought before the BLM for this HMA.
31	Water analysis is inadequate.	Section 3.11 analyzes the wetlands and riparian resource.
32	It is inappropriate for Smith Creek Ranch to be involved in wild horse management.	The BLM will be monitoring the activities, Smith Creek Ranch (SCR) will have to follow BLM protocols, and SCR is not being paid by the BLM.
33	There are EA discrepancies regarding when the proposed gather will take place. In different places the document states summer 2012-fall-2012-summer/fall 2012.	Language in the EA has been changed to "late summer/early fall" for the helicopter gather and bait/water trapping would take place throughout the following years. Fall 2012 was incorrect and has been removed from the final EA.
34	There are EA discrepancies regarding number of horses to be removed; 416 and 450-500, and 525.	416 was not the correct number. The number for gathering is 450-525 and initial removal is 400 because of funding limitations.
35	EA states PZP is most effective if given November through February. But proposed action is to gather 100% in July and PZP 26-33 of the 51 mares you will leave on the range. It is essentially "ineffective" at that time.	PZP is most effective November through February. However, BLM cannot capture all the horses in this timeframe. When PZP is given in the summer the effectiveness will be shortened by several months but it is anticipated that fewer foals will still be born as a result of the PZP treatments. The population suppression program will continue with the annual bait trapping to treat additional mares and to booster the original treated mares. This process will increase the overall effectiveness of the project.
36	No alternatives presented because the No Action alternative is presented as not an option; therefore all other alternatives, no matter how reasonable, innovative, and cost-effective, were pre-emptively eliminated from consideration.	Section 2.4 presents alternatives considered but eliminated from analysis and the reasoning for dismissal. Clarification - The No Action alternative is not optional, it is a NEPA/CEQ requirement.
37	Removing "outsiders" is an ineffective population-control strategy.	The removal of animals residing outside of HMA boundaries is not a population control strategy but a necessary action because the WFRHBA mandates that wild horses residing outside HMAs be removed as excess animals.
38	With regard to tracking and locating wild horses, BLM should employ inconspicuous electronic devices. The use of disfiguring freeze-marks must be prohibited. It should be noted that electronic tracking can also provide a record of each mustang's personal data for longitudinal studies.	Physical marking of the treated animals is a requirement for the use of PZP unless the animals can be clearly and undeniably identify each animal treated. Freeze marking can be read at a distance as oppose to having to recapture and restrain the horse to read a chip and/or adjust radio collars, therefore causing

		additional stress to individuals.
39	WinEquus -- Based on Assumptions Recommendations: Input data needs to be on known individual horses, as the program advises, not on a "snapshot" based on an out-of-date and unreliable aerial census, which was then extrapolated using unverified assumptions.	The Win Equus Population Model was designed to project how wild horse populations may react to different management techniques. The Alternatives were modeled using the 3.2 version of the Win Equus Population Model (Jenkins, 2000). Using the available data, results from the model show that over the next ten years the rate of increase can be reduced from approximately 18% to 2.1% for the Desatoya HMA with PZP-22 contraception boosters given every three years. This equates to 808 fewer excess wild horses that would need to be gathered and placed in the adoption program or sanctuaries.
40	In a study by Hansen, Clark, and Lawhorne (1977), the overlap among range users was found to be: 1% -- deer and wild horses 4% -- deer and cattle 77% -- cattle and wild horses Thus, cattle are four times more likely to affect deer than are horses.	As stated in Section 1.3, "The second need is to decrease density of PJ that has been identified as a primary factor in mule deer population declines as well as several woodland dependent bird species." Therefore, the EA is not indicating that wild horses are causing mule deer declines.
41	The proposed action will spread weeds through rotor wash and hay to feed the horses.	Rotor wash would be no different than wind. Appendix D states, "The contractor would supply certified weed free hay if required by State, County, and Federal regulation."
42	Inadequate analysis of herbicide use on human health/drinking water.	As stated in Section 3.6, as well as many other parts of the EA, "Any herbicide selection and application would be in conformance with Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (EIS) and Record of Decision (ROD) (2007)."
43	Is this EA the first input opportunity the public has had? Was any scoping done?	The 30-day public review of this EA is public scoping. Section 1.8 describes exactly what was done for public scoping.
44	The trap will ONLY be inspected once a day? What if a horse is injured? Will it be left to suffer for 24 hours or so? Since the trap is a remote location, shouldn't a camera be on the gate in case there is a problem or injury to a horse? The BLM should supply cameras and TV monitors, like the ones BLM uses at Palomino Valley or Litchfield. A Veterinarian "may" be on site? A VETERINARIAN SHOULD BE REQUIRED TO BE ONSITE, THE ENTIRE TIME, FOR ALL GATHER ACTIVITIES, including loading and unloading of horses. Also, what experience do Smith Creek Ranch personnel have handling wild horses? What are the requirements? If there are no requirements, I will request a detailed description of the training BLM will give Smith Creek Ranch personnel.	Appendix D outlines the Gather SOPs that will be followed.

45	The BLM is only considering the "proposed action" alone, and is not considering or factoring in cumulative use in the area.	Cumulative effects are analyzed for every resource under Section 3.0. All geothermal exploration and development would undergo separate NEPA analysis.
46	Horses foal March 1 to June 30 as you yourself have said in your EA. Then in July when you plan to gather, they are not 6 months old as you have suggested. As of July they are 1 week old, 2 weeks old…They will not be ready to run 5, 10, 15 miles in the heat of summer at 85 or 90 degrees as the WHB Specialists and Contractors have had them do previously each year only to incur the death of foals. This is inhumane.	The period of March 1 to June 30 is not the identified foaling season for this area but rather BLM's spring closure period for the use of helicopters to gather wild horses except in the case of emergencies. This period covers a range of 6 weeks before and 6 weeks after peak foaling which is mid-April to mid-May. The majority of the foals gathered will be 3-6 months old in mid-August at the time of the proposed gather activities. The draft EA did state that gather activities could be initiated as early as July, but that was incorrect. The final EA states that mid-August would be the earliest that gather activities could be initiated. Also the on-site BLM Project Inspectors (PIs) and Contracting Officer Representatives (CORs) monitor and can control how far wild horse and foals are to be brought on a case by case and day by day basis to preventing wild horses and foals from becoming overheated and overly physical exerted. Bands of horses that have foals or members that cannot keep up can be dropped out of the gather operation by the direction of the BLM PI and COR until the fatigued horses can regain their strength.
47	Impacts to horses from all aspects of the project, such as fencing and tree removal equipment, is insufficient in the EA.	Fences will be marked and impacts are expected to be negligible. The total acres for the 3 fenced areas are only about 200 acres. This is only 0.1% of the HMA and would not disrupt free-roaming behavior. No more than 5000 acres of pinyon/juniper would be treated in any given year over a ten year period. This is only 3.1% of the HMA. The temporary displacement of horses will be short lived and the resulting habitat improvements would benefit horses over the long term by restoring hydrologic function in degraded meadow areas, thus improving water sources over time. Additionally, tree densities would be reduced creating more forage grasses.
48	Livestock damage has been the major cause of declining sage grouse populations throughout the West. Reducing trees and sagebrush will destroy more habitats that sage-grouse need and is not restoration.	Woodlands are not a component of sage-grouse habitat. Additionally, the 12 month finding from the USFWS published in the Federal Register March 5, 2010 evaluated 5 factors for the listing decision for sage-grouse. Factor A

		evaluates habitat/range issues. The document states: "Several factors are contributing to the destruction, modification, or curtailment of the greater sage-grouse's habitat or range…. Sagebrush habitats are becoming increasingly degraded and fragmented due to the impacts of multiple threats, including direct conversion, urbanization, infrastructure such as roads and powerlines built in support of several activities, wildfire and the change in wildfire frequency, incursion of invasive plants, grazing, and nonrenewable and renewable energy development. Many of these threat factors are exacerbated by the effects of climate change, which may influence long-term habitat trends." Therefore, while grazing is a factor in the decline of sage-grouse it is not the ***major*** factor.
49	Removing decadent stands of sagebrush is not appropriate for sage-grouse habitat restoration.	This portion of Section 2.1 was removed from the Final EA.
50	Could you consider setting up a well-rounded taskforce of biologist, horse rescuers, cattlemen, citizens, veterinarians, businessmen to provide proper guidelines for the ongoing wellness of our horses on public land?	This is being looked at the national level through a program review by national science academy.
51	The NEPA requires Federal agencies to consider environmental effects that include, among others, impacts on social, cultural, and economic resources, as well as natural resources. The BLM is violating NEPA by producing a PEA that fails to analyze these impacts	Section 3.0 provides the analysis of resources that were brought forward for analysis and reasoning for resources that were not analyzed.
52	EA omits discussion of adaptive management strategy.	Section 2.1 subheading Monitoring/Adaptive Management provides this discussion.
53	The EA fails to adequately consider the harmful environmental impacts of the widespread use of herbicides to kill pinyon pines, juniper trees and sagebrush, as well as the harmful impacts of additional fencing in this area.	Herbicides would not negatively impact riparian or wetland areas due to a "no treatment" buffer zone of at least 100 feet from drainage bottoms and 300 feet around springs and perennial water sources that would be implemented near these areas. Adherence to the Standard Operating Procedures and Project Design Features for Herbicide Applications as identified and analyzed in the Final Programmatic Environmental Impact Statement (EIS) – Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (2007) will be followed. Herbicide use is not widespread. It is only for monotypic stands of rabbitbrush in Dalton Canyon and the fuels treatment near Cold Springs. This is about 650 acres, which is approximately 0.3% of the project area. Only pinyon and juniper trees will be completely removed where they have invaded sagebrush plant communities. In woodland communities trees will just be thinned out. Section 3.0 provides the analysis of impacts.
54	Removal of pinyon and juniper trees should be hand	Section 2.1 provides for multiple methods of

	cut only and not indiscriminately destroyed on a large scale.	removing trees including hand treatment.
55	Data on actual livestock use monitoring has not been provided for current use since the MUDs or historic periods.	Current allotment monitoring data is available from the Stillwater Field Office at the Carson City District Office.
56	No data supporting that tree density has caused declines in mule deer and pinyon-juniper dependent avifauna.	In Section 3.3, the Nevada Comprehensive Bird Conservation Plan and references therein were referenced as the supporting data that indicates high densities of PJ cause declines in mule deer and pinyon-juniper dependent avifauna.
57	The adaptive management and monitoring section of EA maximizes uncertainty and is not clear on how success/failure of treatments will be measured.	See comment 52.
58	Detailed mapping of all sage-grouse leks and numbers of birds on leks currently and into the future must be provided.	Appendix G Map 8 shows detailed mapping of leks. Numbers of birds vary at any given time or year so it is impossible to provide this information into the future.
59	There is no current Rangeland Health Analysis; therefore BLM's claims about improvements on rangeland health are arbitrary.	Section 3.7 states; "Successful treatments should help maintain, restore, or increase soil site stability, hydrologic function, and biotic integrity. This is expected to maintain, restore, or increase capacity for the capture, storage, and safe release of precipitation, the conversion of sunlight to plant and then animal matter, and the cycle of nutrients through the environment. Resilient plant communities have a greater ability to recover from random events such as wildlife or droughts, thus diminishing the duration of potential grazing closures stemming from future wildfires or reduced potential AUMs resulting from drought. Furthermore under the No action subheading in Section 3.7 it states; "…as forage quantity and quality declines because Conformance with the Standards and Guidelines for Rangeland Health would likely not be met when a current assessment is undertaken in 2014." "Successful treatments should help" & "Likely to not be met" are not arbitrary statements because they are based on scientific knowledge of how plant communities function and the local conditions specifically found in the project area.